

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

NAZOKAT ATAKHANOVA, individually and  
on behalf of all others similarly situated,

Plaintiff,

- against -

HOME FAMILY CARE INC., and  
ALEXANDER KISELEV

Defendant.

Index No. 16-cv-6707  
(KAM)(RML)

**NOTICE OF  
MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Affirmation of LaDonna M. Lusher, sworn to on October 8, 2018, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move this Court, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, before the Honorable Kiyo A. Matsumoto, on a return date set by the Court, for Plaintiffs application seeking leave to amend their Complaint, together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
October 8, 2018

VIRGINIA & AMBINDER, LLP

/s/

By: Lloyd Ambinder, Esq.  
LaDonna Lusher, Esq.  
Joel Goldenberg, Esq.  
40 Broad St., 7th Floor  
New York, New York 10004  
Tel: (212) 943-9080  
Fax: (212) 943-9082  
llusher@vandallp.com

Naydenskiy Law Firm, LLC  
Gennadiy Naydenskiy, Esq.  
281 Summerhill Rd, Suite 210

East Brunswick, NJ, 08816  
Tel: (800) 789-9396  
naydenskiylaw@gmail.com

*Attorneys for Plaintiffs*